

Comment - Organic Ruminant Pasture IssueFrom: brandon.ziegler@linklaters.com  
Sent: Wednesday, June 07, 2006 12:26 PM  
To: NOP Livestock  
Subject: Comment - Organic Ruminant Pasture Issue

Attachments: ATTACHMENT.TXT

Mark A. Bradley, Associate Deputy Administrator, Transportation and Marketing Programs, National Organic Program, 1400 Independence Ave., SW., Room 4008-So., Ag Stop 0268, Washington, DC 20250.

Dear Mr. Bradley,

As a consumer, I am writing to express my view that in order for milk, cheese, meat, and other products of ruminant animals to qualify to be labeled as "organic," the animals from which they come should have daily access to grassy pasture.

The label "organic" creates an expectation that the animals are not confined to crowded pens or barns, and that confinement indoors be restricted to short periods of time when required due to the illness of the animal or inclement weather. This is because the label "organic" creates an expectation of humane treatment and sustainable farming practices that do not overly tax the surrounding land. Crowded factory farming conditions violate the expectations of consumers for a variety of reasons. Crowded in-barn farming conditions increase the likelihood of disease, which would result in the need to use antibiotics on animals; the "organic" label implies that no antibiotic use occurs (except in rare cases of single animal illness - and such animals should be segregated from the herd for treatment and its milk is not sold to the public). Moreover, because "organic" implies no use of chemical or artificial feeds, the expectation is that these animals have access to natural pastureland upon which to graze and that this pastureland itself is not sprayed with chemicals.

I strongly urge that the limitation that "access to shade, shelter, fresh air and daylight suitable to species" not be limited by the restriction that such access be "suitable to the stage of production." This is a HUGE loophole which would enable dairy farmers to confine milk cows to barns for the entire stage of milk production, which could last the majority of the year.

This amounts to government encouragement and complicity in false advertising. Consumers are willing to pay higher prices to purchase organic goods in order to compensate farmers for the extra costs of moving animals in and out of barns at milking time and running smaller, more sustainable farming operations with greater per capita amount of pastureland per animal.

The standards as currently drafted permit and in fact encourage false advertising and misleading of the consumer. This permits larger factory farming operations to mark up their prices without providing the services implied. Your agency's complicity in promulgating regulations with this sort of a loophole amounts to a violation of the public trust - we fund your agency through our tax dollars with the expectation that you will live up to the mandate to ensure that public health and welfare are protected

and that consumers are not misled by false advertising. This is outrageous.

Accordingly I strongly urge you to: 1) ensure that products cannot be labeled organic unless the animals from which these products are derived are provided access to pasture to graze upon that itself is free from pesticides and chemicals, and 2) to revise your definitions to make clear that such access should occur during the life of the animal, and not be restricted to what is in effect, when it is "convenient" for the farmer. That is not an organic standard, indeed, it is no standard at all.

Thank you for your consideration of these comments.

Sincerely,

Brandon Ziegler

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